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CONSTANCE A. LANCASTER and SHASTA GENERAL  
ENGINEERING, INC.

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

MARK J. HANSEN, MONICA S.  
HANSEN, BERNIE L. HANSEN, KELLY  
A. HANSEN, CARL J. BARTALDO,  
DONALD R. LANCASTER, CONSTANCE  
A. LANCASTER, and SHASTA  
GENERAL ENGINEERING, INC., a  
California corporation,

Plaintiffs,

vs.

ARTHUR SCHUBERT; JOYCE BARAL;  
BERNIE RENTERIA; R. GARCIA; GREG  
A. ZIEGLER; VINCENT ZAMBRANA;  
STEPHANIE MCCALL; SHON HILL;  
CRAIG BURSON; K.R. ERICSON; and  
DOES 1 through 50, inclusive,  
Defendants.

Civil Action No.CIV-S-02-0850 FCD GGH

**STIPULATION AND ORDER  
REGARDING EXPERT  
DISCLOSURE AND  
DISCOVERY**

“AS MODIFIED”

WHEREAS counsel for plaintiffs shared with defendants’ counsel by email a proposed motion, declaration and supporting memorandum to extend time for expert witness designation pursuant to FRCP 16(b); and

WHEREAS plaintiffs’ counsel also suggested stipulations regarding other pending matters;  
and

1 WHEREAS the parties wish to amicably resolve procedural disputes in the interest of  
2 convenience and economy;

3 THEREFORE the parties hereby stipulate and request the Court's approval of the following:

4 1. Defendants will withdraw their objection to the disclosure two days late of Everett P.  
5 Harry as plaintiffs' damages expert;

6 2. Defendants may designate a rebuttal expert within two weeks after the Court's ruling  
7 on their intended motion for summary judgment and the parties will depose the respective damages  
8 experts within four weeks after the ruling on the motion for summary judgment;

9 3. Plaintiffs will dismiss Defendant Joyce Baral on condition that defendants will make  
10 her available for testimony at trial without the need for a subpoena;

11 4. Plaintiffs will dismiss Defendants Bernie Renteria and Shon Hill unconditionally.  
12

13 DATED: July 13, 2006

LAW OFFICES OF MICHAEL S. SORGEN

14  
15 /s/ Michael-Sorgen  
16 Michael . Sorgen  
17 Attorney for Plaintiffs

18 DATED: July 14, 2006

19 /s/ Kevin-Reager  
20 Kevin Reager  
21 Attorney for Defendants

22 ORDER

23 The court interprets this stipulation as a Motion to Modify the Pretrial Scheduling Order  
24 pursuant to FRCP 16(b) and upon review of this stipulation and the history of this case finds that  
25 good cause exists to modify the Pretrial Scheduling order. Accordingly, the Pretrial Scheduling  
26 Order is modified to incorporate the added conditions as set forth in the stipulation above.

27 IT IS SO ORDERED

28 Dated: July 18, 2006

/s/ Frank C. Damrell Jr.  
Honorable Frank C. Damrell, Jr.  
United States District Judge